

LAW OFFICES OF RICHARD A. FOGEL, P.C.

AV RATED/BEST'S RECOMMENDED INSURANCE ATTORNEY

RICHARD A. FOGEL, ESQ.

389 CEDAR AVENUE

ISLIP, N.Y. 11751-4627

(516) 721-7161

(631) 650-5254 (FAX)

RFOGEL@RFOGELLAW.COM

*Insurance Coverage, Toxic Torts, Environmental,
Product Liability & Commercial Litigation*

New York & New Jersey

www.rfogellaw.com

** Application granted.

SO ORDERED.

s/ Leda Dunn Wettre, U.S.M.J.

Dated: 9/28/2023

September 27, 2023

VIA DNJ ECF

Hon. Leda Dunn Wettre

United States District Court for the District of New Jersey

Martin Luther King Building & U.S. Courthouse

50 Walnut Street

Newark, N.J. 07101

Re: *Sawhney v. Chubb Insurance Company of New Jersey*

Docket No. 2:21-cv-14675-KSH-LDW

Your Honor:

This firm represents the plaintiffs in the above referenced insurance coverage litigation. I write to request that the Court permit a reasonable briefing schedule of thirty days to oppose (Oct. 23) and 2 weeks to reply (Nov. 6) to Chubb's 190-page motion for partial summary judgment**, filed Friday September 22, 2023 at 4:24 P.M., before Yom Kippur on Monday September 25. Currently my opposition is due on October 2. Your Honor told me to let you know if I need more time when we discussed a motion to compel appraisal, and I do need more than four business days to respond to this motion and I think that 30-14 is reasonable given that the scope of this motion is far broader than what I anticipated. I asked Mr. McClellan to stipulate to the proposed briefing schedule and at this time he has not agreed. I am available for a conference at any time today or tomorrow at the court's convenience.

Thank you for your time and consideration.

Respectfully submitted,

Richard A. Fogel

Richard A. Fogel

cc: Cynthia Bernstiel, Esq., George McClellan by ECF